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10 UNITED STATES DISTRICT COURT
11 DISTRICT OF NEVADA

12 Robert Geoffrey Davis,
13 Petitioner,
14 v.
15 Gabriela Najera, *et al.*,
16 Respondents.

Case No. 2:23-cv-01208-APG-MDC

**Unopposed Motion to Extend Time
to File Second Amended Petition
(First Request)**

1 **POINTS AND AUTHORITIES**

2 Petitioner Robert Geoffrey Davis respectfully moves for an extension of 45 days
3 to file his Second Amended Petition under 28 U.S.C. § 2254, up to and including May
4 16, 2024. The Second Amended Petition is currently due on April 1, 2023.¹
5 Respondents, by Deputy Attorney General Elsa Felgar, do not object to this request
6 for an extension. Respondents' lack of objection should not be construed as a waiver
7 or concession of any kind or construed as agreeing with the accuracy of the
8 representations in this motion. This is Davis's first request for an extension.

9 On December 20, 2023, Davis filed his first amended petition and moved for
10 leave to file a second amended petition.² Davis filed his first amended petition to meet
11 the statutory AEDPA deadline. On February 14, 2024, this Court granted Davis's
12 motion to amend his petition.³

13 Davis filed his motion for leave to amend his petition so that he could further
14 investigate his case.⁴ Counsel has been diligently investigating his case by litigating
15 a motion to unseal court records in the Second Judicial District Court, Washoe
16 County, Nevada. Counsel also recently met with Davis at Southern Desert
17 Correctional Center to discuss his case. Counsel needs more time to continue
18 investigating Davis's case.

19 This motion is not filed for the purposes of delay, but in the interests of justice
20 and the interests of Davis. Counsel respectfully asks this Court to grant Davis's
21 request to extend the time for filing his amended petition by 45 days until May 16,
22 2024.

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24
25 ¹ See ECR No. 8.

26 ² ECF Nos. 12, 14.

27 ³ ECF No. 19.

⁴ ECF No. 14 at 2.

1 Dated March 29, 2024.

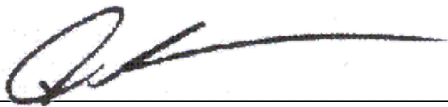
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3 Respectfully submitted,

4
5 Rene L. Valladares
6 Federal Public Defender

7 /s/ Ron Y. Sung

8 Ron Y. Sung
9 Assistant Federal Public Defender

10 IT IS SO ORDERED:

11
12 

13 United States District Judge

14 Dated: March 29, 2024